

# **EPA Reg. No. 89015-1**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

June 19, 2013

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

MR. MICAH T. REYNOLDS  
TECHNOLOGY SCIENCES GROUP, INC, AGENT FOR  
OREGON GLOBAL DISTRIBUTION , INC  
D/B/A NPK INDUSTRIES  
1150 18TH STREET, NW, STE 1000  
WASHINGTON, DC 20036-

Dear Mr. Reynolds:

Subject: Transfer of Pesticide Registrations and Data From Company Number 89015 to  
Company Number 89819

Pursuant to your request in your letter and transfer agreement of April 16, 2013, we have  
approved the transfer of the following registrations from NPK, LLC, company number 89015 to  
OREGON GLOBAL DISTRIBUTION , INC, company number 89819.

The effective date of these changes is the date of this letter.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
<b>SYNERGY</b>	<b>89015-1</b>	<b>89819-1</b>

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental

distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The annual maintenance fee is based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

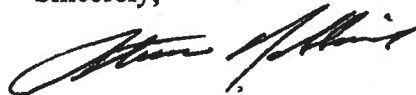
The Agency acknowledges it has received a request for data transfer dated April 16, 2013 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **OREGON GLOBAL DISTRIBUTION, INC.** will be considered the data owner. This action will not automatically reflect on the Data Submitters List.

If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,



Steve Robbins, Chief  
Information Services Branch  
Information Technology & Resource Management Div. (7504P)

cc: MR. MICAH T. REYNOLDS  
TECHNOLOGY SCIENCES GROUP, INC, AGENT FOR  
NPK, LLC  
1150 18TH STREET, NW, SUITE 1000  
WASHINGTON, DC 20036

cc: MR. RENY TOWNSEND  
NPK, LLC, D/B/A NPK INDUSTRIES  
1600 SKYPARK DRIVE, SUITE 212  
MEDFORD, OR 97504

RE: L\_89015\_RAD\_89819\_06\_19\_2013

## APPENDIX A

**Reference: 40 CFR § 152.98 (a) (3)**

**For Exclusive Use See: 7 USC § 136 et seq., Federal Insecticide Fungicide Rodenticide Act (FIFRA), Sec. 3 (c) (1) (F)**

MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
48905500	Transmittal Document	Not Applicable	8/10/2012	N	
48905501	Synergy: Chemistry Data/Product Properties – Group A	Technology Sciences Group, Inc.	8/10/2012	Y	8/10/2027
48905502	Synergy: Chemistry Data/Product Properties – Group B	Technology Sciences Group, Inc. & Eurofins Product Safety Laboratories, Inc.	8/10/2012	Y	8/10/2027

**Technology Sciences Group Inc.**

1150 18<sup>th</sup> Street, Suite 1000  
Washington, DC 20036  
Direct: (202) 828-8967  
Fax: (202) 872-0745  
E-Mail: MReynolds@TSGUSA.com



**Micah T. Reynolds**  
Senior Regulatory Consultant

March 7, 2013

**NPK LLC**  
**Submission of Final Printed Label for**  
**Synergy; EPA Reg. No. 89015-1**

Mr. Richard Gebken, PM-10  
Ms. BeWanda Alexander  
Registration Division (7505P)  
Document Processing Center (FPL)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard, Room S-4900  
2777 South Crystal Drive  
Arlington, Virginia 22202

Dear Mr. Gebken and Ms. Alexander:

Technology Sciences Group, Inc. (TSG), on behalf of NPK LLC, is submitting the enclosed final printed label for the above referenced product pursuant to the Agency's letter and stamped accepted label, dated February 27, 2013. All of the Agency's requested revisions were incorporated into the enclosed final printed label. Please find enclosed the following in support of this response:

- 1) Application for Pesticide Registration (EPA Form 8570-1);
- 2) Two copies of the Final Printed Label.

If you have any questions or require additional information, please do not hesitate to contact me by phone at (202) 828-8967 or via e-mail at [mreynolds@TSGUSA.com](mailto:mreynolds@TSGUSA.com).

Sincerely,

Regulatory Consultant to NPK LLC

Enclosures

CC: R. Townsend (NPK)

Washington, D.C.  
1150 18<sup>th</sup> St., NW, Suite 1000  
Washington, D.C. 20036  
Phone: (202) 223-4392

California  
712 Fifth St., Suite A  
Davis, CA 95616  
Phone: (530) 757-1245

Canada  
275 Slater St., Suite 900  
Ottawa, Ontario K1P 5H9  
Phone: (613) 247-6285

		United States <b>Environmental Protection Agency</b> Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
<b>Application for Pesticide – Section I</b>					
1. Company/Product Number <b>89015-1</b>		2. EPA Product Manager <b>Richard Gebken</b>		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) <b>Synergy</b>		PM# <b>10</b>			
5. Name And Address Of Applicant (Include ZIP Code) <b>NPK LLC</b> <b>1600 Skypark Drive, Suite 215</b> <b>Medford, Oregon 97504</b>  <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:  EPA Reg. No. _____  Product Name _____			
<b>Section II</b>					
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.		<input checked="" type="checkbox"/> Final Printed labels in response to Agency letter dated <b>February 27, 2013</b> <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain Below.			
<b>Explanation:</b> Use additional page(s) if necessary. (For section I and Section II.)  <b>Submission of Final Printed Labeling for the above referenced product in response to the Agency's stamped accepted label, dated February 27, 2013.</b>  <b>Please confirm receipt with Micah Reynolds: <a href="mailto:mreynolds@tsgusa.com">mreynolds@tsgusa.com</a>, via phone (202) 828-8967, or via fax (202) 872-0745.</b>					
<b>Section III</b>					
1. Material This Product Will Be Packaged In:					
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No <b>* Certification must be submitted</b>	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes"      No. per Unit Packaging wgt.      Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes"      No. per Unit Packaging wgt.      Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label Is Affixed to Product		<input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			
<b>Section IV</b>					
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name <b>Micah T. Reynolds, Technology Sciences Group, Inc.</b>		Title <b>Senior Regulatory Consultant</b>		Telephone No. (Include Area Code) <b>(202) 828-8967</b>	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title <b>Regulatory Consultant to NPK, LLC</b>			
4. Typed Name <b>Micah T. Reynolds</b>		5. Date <b>March 6, 2013</b>			

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

## (MASTER LABEL)

# Synergy

(Alternate Brand Names: Synergy – Flower, Fruit & Vegetable Insect Killer; Synergy Spider Mite Killer; Spider Mite Killer)

For use in home gardens, indoor houseplants, and greenhouses.

### Active Ingredients

Pyrethrins.....	0.0075%
Canola Oil.....	1.3500%
<b>Other Ingredients.....</b>	<b>98.6425%</b>
<b>Total</b>	<b>100.0000%</b>

This product contains 0.1112 lbs. of canola oil and 0.0006 lbs. of pyrethrins per gallon.

## CAUTION KEEP OUT OF REACH OF CHILDREN

FIRST AID	
<b>IF SWALLOWED</b>	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
<b>IF ON SKIN OR CLOTHING:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific Time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.	

See [back] [other] [side] [panel] for additional precautionary statements.

Manufactured for:  
NPK LLC  
1600 Skypark Drive, Suite 215  
Medford, OR 97504

EPA Reg. No. 89015-1  
EPA Est. No. \_\_\_\_\_

Net Contents:

Batch No. (Note to reviewer: the lot or batch number may also be stamped directly on the product container.)



## PRECAUTIONARY STATEMENTS

**Hazards to Humans and Domestic Animals:** CAUTION: Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

### User Safety Recommendations

- Users should wash hands with plenty of soap and water before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing immediately if pesticide gets inside, then wash thoroughly and put on clean clothing.

### Environmental Hazards

This product is toxic to aquatic organisms including fish and invertebrates. To protect the environment do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid runoff to water bodies or drainage systems. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

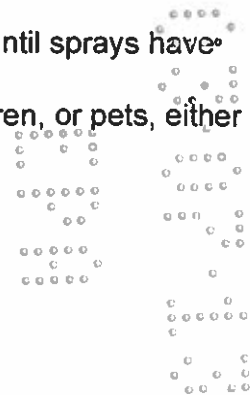
## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use in home gardens, indoor houseplants, and greenhouses. Read entire label. Use only as directed. Shake well before each use. Thoroughly wet all parts of the plants. Do not wet plants to point of runoff or drip.

## USE RESTRICTIONS

- Do not allow adults, children, or pets to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.
- Remove pets, birds, and cover fish aquariums before spraying.
- Do not use Synergy spray when temperatures are above 90°F.
- Do not apply more than 1 time per day.
- Do not apply within 21 days of a sulfur application.
- Do not apply more than 10 times per season.
- Not for use in outdoor residential misting systems.



(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

- Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water treated area(s) or apply prior to heavy rainfall.

**Phytotoxicity:** Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar, and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

## PESTS/SITES AND APPLICATION INSTRUCTIONS

[Synergy will kill] [Kills] [adelgids], [ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)], [exposed aphids], [apple red bugs], [beetles (blister beetle, Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Mexican bean beetle, spotted cucumber beetle, flea beetle)], [cabbage loopers], [caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers)], [centipedes], [earwigs], [fruittree leafrollers], [fungus gnats], [grape phylloxera], [grubs], [harlequin bugs], [lace bugs], [leafhoppers], [leafminers], [Lygus bugs], [mealybugs], [midges], [millipedes], [moths], [pear psylla], [pillbugs], [phylloxera], [psyllids], [plant bugs], [scale], [sawfly larvae], [silverfish], [sowbugs], [spider mites], [spittlebugs], [springtails], [stinkbugs], [thrips], [whitefly adelgids], [whiteflies], [weevils], [worms (cankerworms, cabbage worms, webworms)], [and eggs of listed insects]

## OUTDOOR USE

For use outdoors on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 2.5 gal. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

## HOME GREENHOUSE USE

For use in home greenhouses on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 32 oz. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

## INDOOR USE

For use indoors on houseplants.

## DORMANT USE

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

Kills exposed egg stages of listed pests present in dormant season and scale insects, spider mites and mealybugs on dormant shrubs (roses), evergreens, fruit trees, and shade trees. Thoroughly wet the dormant plants or trees.

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

(Note to reviewer: The following statements for residential use containers ≤5 gal.)

**STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

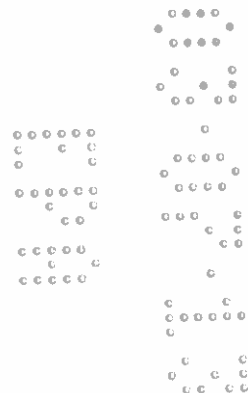
(Note to reviewer: The following statements for containers >5 gal. This product is non-dilutable.)

**PESTICIDE STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

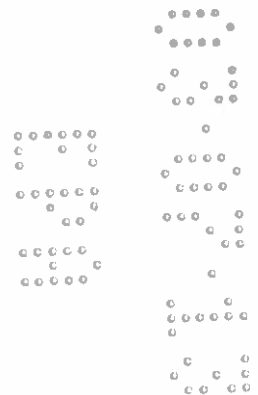
[Notice to Buyer: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with label directions.]



(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

**Optional Marketing claims, pictograms, and product information**  
(May be presented on the container or supplemental labeling)

- For Homeowner use
- Fast acting
- Dormant and growing season insect spray to kill exposed adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Kills Japanese Beetles
- Kills all accessible stages of listed [crawling] [and] [flying] insects [including eggs].
- Kills all accessible stages of listed insects [including eggs].
- Kills all accessible stages of spider mites [including eggs].
- Kills by contact insecticide, ovicide.
- Kills spider mites, whiteflies, aphids, and all accessible stages of listed insects and eggs
- For roses, flowers, and vegetables
- Contains pyrethrins and canola oil
- For use on plants – indoors and outdoors
- Can use on [flowers], [vegetables], [fruits], and [roses]
- Easy to use
- Insecticide/Miticide
- Insect spray
- [Use on] Roses and flowers
- [Use on] Houseplants and gardens
- [Use on] Fruits and vegetables
- Synergy kills listed [insect] pests by contact.
- Kills by contact
- For best results, pests must be contacted directly with spray
- Kills listed insects by contact
- Kills listed bugs by contact
- Read entire container label before using this product
- Questions, Comments Call XXX-XXX-XXXX
- Made in USA
- (Insert company website)
- Some floors may be slippery after spraying



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**(MASTER LABEL)**

# Synergy

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See [back] [other] [side] [panel] for additional precautionary statements.

Manufactured for:  
NPK LLC  
1600 Skypark Drive, Suite 215  
Medford, OR 97504

EPA Reg. No. 89015-1  
EPA Est. No. \_\_\_\_\_

Net Contents:

Batch No. (Note to reviewer: the lot or batch number may also be stamped directly on the product container.)

Synergy; EPA File Symbol 89015-1  
MASTER LABEL - Label version (5) - dated March 6, 2013  
Final Printed Label  
Page 1 of 5

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## DIRECTIONS FOR USE

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**Phytotoxicity:** Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar, and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

## PESTS/SITES AND APPLICATION INSTRUCTIONS

[Synergy will kill] [Kills] [adelgids], [ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)], [exposed aphids], [apple red bugs], [beetles (blister beetle, Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Mexican bean beetle, spotted cucumber beetle, flea beetle)], [cabbage loopers], [caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers)], [centipedes], [earwigs], [fruittree leafrollers], [fungus gnats], [grape phylloxera], [grubs], [harlequin bugs], [lace bugs], [leafhoppers], [leafminers], [Lygus bugs], [mealybugs], [midges], [millipedes], [moths], [pear psylla], [pillbugs], [phylloxera], [psyllids], [plant bugs], [scale], [sawfly larvae], [silverfish], [sowbugs], [spider mites], [spittlebugs], [springtails], [stinkbugs], [thrips], [whitefly adelgids], [whiteflies], [weevils], [worms (cankerworms, cabbage worms, webworms)], [and eggs of listed insects]

## OUTDOOR USE

For use outdoors on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 2.5 gal. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

## HOME GREENHOUSE USE

For use in home greenhouses on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 32 oz. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

## INDOOR USE

For use indoors on houseplants.

## DORMANT USE

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

Kills exposed egg stages of listed pests present in dormant season and scale insects, spider mites and mealybugs on dormant shrubs (roses), evergreens, fruit trees, and shade trees. Thoroughly wet the dormant plants or trees.

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

(Note to reviewer: The following statements for residential use containers ≤5 gal.)

**STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

(Note to reviewer: The following statements for containers >5 gal. This product is non-dilutable.)

**PESTICIDE STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

[Notice to Buyer: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with label directions.]

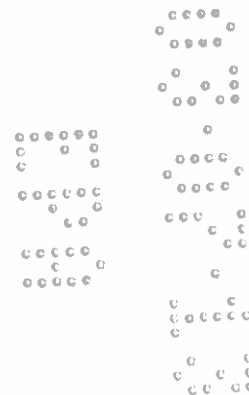




(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

**Optional Marketing claims, pictograms, and product information**  
(May be presented on the container or supplemental labeling)

- For Homeowner use
- Fast acting
- Dormant and growing season insect spray to kill exposed adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Kills Japanese Beetles
- Kills all accessible stages of listed [crawling] [and] [flying] insects [including eggs].
- Kills all accessible stages of listed insects [including eggs].
- Kills all accessible stages of spider mites [including eggs].
- Kills by contact insecticide, ovicide.
- Kills spider mites, whiteflies, aphids, and all accessible stages of listed insects and eggs
- For roses, flowers, and vegetables
- Contains pyrethrins and canola oil
- For use on plants – indoors and outdoors
- Can use on [flowers], [vegetables], [fruits], and [roses]
- Easy to use
- Insecticide/Miticide
- Insect spray
- [Use on] Roses and flowers
- [Use on] Houseplants and gardens
- [Use on] Fruits and vegetables
- Synergy kills listed [insect] pests by contact.
- Kills by contact
- For best results, pests must be contacted directly with spray
- Kills listed insects by contact
- Kills listed bugs by contact
- Read entire container label before using this product
- Questions, Comments Call XXX-XXX-XXXX
- Made in USA
- (Insert company website)
- Some floors may be slippery after spraying





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 27, 2013

Micah T. Reynolds  
Agent for NPK LLC  
Technology Sciences Group Inc  
1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, DC 20036

Subject: Amendment – Response to Agency’s December 17, 2012 letter  
Synergy  
EPA Reg. No. 89015-1  
Your submission dated February 1, 2013


Dear Mr. Reynolds:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Add “Harmful if swallowed” to the Precautionary Statements.
2. On page 2 delete the statement “May be used on edible crops up to and including day of harvest” from the Directions for Use.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions regarding this action, please contact BeWanda Alexander at [Alexander.bewanda@epa.gov](mailto:Alexander.bewanda@epa.gov) or (703) 305-7460.

Sincerely,  
  
Richard Gebken  
Product Manager  
Insecticide Branch  
Registration Division (7505P)

Enclosure

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(MASTER LABEL)

**Synergy**

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated**

**FEB 27 2013**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.

**89015-1**

(Alternate Brand Names: Synergy – Flower, Fruit & Vegetable Insect Killer; Synergy  
Spider Mite Killer; Spider Mite Killer)

For use in home gardens, indoor houseplants, and greenhouses.

**Active Ingredients**

Pyrethrins.....	0.0075%
Canola Oil.....	1.3500%
<b>Other Ingredients.....</b>	<b>98.6425%</b>
<b>Total</b>	<b>100.0000%</b>

This product contains 0.1112 lbs. of canola oil and 0.0006 lbs. of pyrethrins per gallon.

**CAUTION**  
**KEEP OUT OF REACH OF CHILDREN**

FIRST AID	
<b>IF SWALLOWED</b>	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
<b>IF ON SKIN OR CLOTHING:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific Time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.	

See [back] [other] [side] [panel] for additional precautionary statements.

Manufactured for:  
NPK LLC  
1600 Skypark Drive, Suite 215  
Medford, OR 97504

EPA Reg. No. 89015-1  
EPA Est. No. \_\_\_\_\_

Net Contents:

Batch No. (Note to reviewer: the lot or batch number may also be stamped directly on the product container.)

**Synergy**; EPA File Symbol 89015-1  
MASTER LABEL - Label version (4) – dated January 15, 2013  
Final Printed Label  
Page 1 of 5

## PRECAUTIONARY STATEMENTS

**Hazards to Humans and Domestic Animals:** CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

### User Safety Recommendations

- Users should wash hands with plenty of soap and water before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing immediately if pesticide gets inside, then wash thoroughly and put on clean clothing.

### Environmental Hazards

This product is toxic to aquatic organisms including fish and invertebrates. To protect the environment do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid runoff to water bodies or drainage systems. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use in home gardens, indoor houseplants, and greenhouses. Read entire label. Use only as directed. Shake well before each use. Thoroughly wet all parts of the plants. Do not wet plants to point of runoff or drip. May be used on edible crops up to and including day of harvest.

## USE RESTRICTIONS

- Do not allow adults, children, or pets to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.
- Remove pets, birds, and cover fish aquariums before spraying.
- Do not use Synergy spray when temperatures are above 90°F.
- Do not apply more than 1 time per day.
- Do not apply within 21 days of a sulfur application.
- Do not apply more than 10 times per season.
- Not for use in outdoor residential misting systems.

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

- Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water treated area(s) or apply prior to heavy rainfall.

**Phytotoxicity:** Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar, and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

## **PESTS/SITES AND APPLICATION INSTRUCTIONS**

[Synergy will kill] [Kills] [adelgids], [ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)], [exposed aphids], [apple red bugs], [beetles (blister beetle, Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Mexican bean beetle, spotted cucumber beetle, flea beetle)], [cabbage loopers], [caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers)], [centipedes], [earwigs], [fruittree leafrollers], [fungus gnats], [grape phylloxera], [grubs], [harlequin bugs], [lace bugs], [leafhoppers], [leafminers], [Lygus bugs], [mealybugs], [midges], [millipedes], [moths], [pear psylla], [pillbugs], [phylloxera], [psyllids], [plant bugs], [scale], [sawfly larvae], [silverfish], [sowbugs], [spider mites], [spittlebugs], [springtails], [stinkbugs], [thrips], [whitefly adelgids], [whiteflies], [weevils], [worms (cankerworms, cabbage worms, webworms)], [and eggs of listed insects]

## **OUTDOOR USE**

For use outdoors on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 2.5 gal. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

## **HOME GREENHOUSE USE**

For use in home greenhouses on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 32 oz. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

## **INDOOR USE**

For use indoors on houseplants.

## **DORMANT USE**

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

Kills exposed egg stages of listed pests present in dormant season and scale insects, spider mites and mealybugs on dormant shrubs (roses), evergreens, fruit trees, and shade trees. Thoroughly wet the dormant plants or trees.

#### **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage and disposal.

(Note to reviewer: The following statements for residential use containers ≤5 gal.)

**STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

(Note to reviewer: The following statements for containers >5 gal. This product is non-dilutable.)

**PESTICIDE STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

[Notice to Buyer: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with label directions.]

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

**Optional Marketing claims, pictograms, and product information**  
(May be presented on the container or supplemental labeling)

- For Homeowner use
- Fast acting
- Dormant and growing season insect spray to kill exposed adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Kills Japanese Beetles
- Kills all accessible stages of listed [crawling] [and] [flying] insects [including eggs].
- Kills all accessible stages of listed insects [including eggs].
- Kills all accessible stages of spider mites [including eggs].
- Kills by contact insecticide, ovicide.
- Kills spider mites, whiteflies, aphids, and all accessible stages of listed insects and eggs
- For roses, flowers, and vegetables
- Contains pyrethrins and canola oil
- For use on plants – indoors and outdoors
- Can use on [flowers], [vegetables], [fruits], and [roses]
- Easy to use
- Insecticide/Miticide
- Insect spray
- [Use on] Roses and flowers
- [Use on] Houseplants and gardens
- [Use on] Fruits and vegetables
- Synergy kills listed [insect] pests by contact.
- Kills by contact
- For best results, pests must be contacted directly with spray
- Kills listed insects by contact
- Kills listed bugs by contact
- Read entire container label before using this product
- Questions, Comments Call XXX-XXX-XXXX
- Made in USA
- (Insert company website)
- Some floors may be slippery after spraying



U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division (H7505C)  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

EPA Reg. Number:  
89015-1

Date of Issuance:  
DEC 17 2012

Term of Issuance:  
Unconditional

Name of Pesticide Product:

Synergy

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration

(Under FIFRA as amended)

Name and Address of Registrant (include ZIP Code):

NPK LLC

1600 Skypark Drive, Suite 215

Medford, Oregon 97504

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is **unconditionally** registered in accordance with FIFRA sec. 3(c)(5). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3).

1. You will make the following label changes before you release the product for shipment:

a) Revise the EPA Registration Number to read "EPA Reg. No. 89015-1."

b) Revise *Precautionary Statements* to read as follows:

"CAUTION. Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse."

c) Add "If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person." To the *First Aid* statement.

Signature of Approving Official:

*Richard Gebken*  
Richard Gebken Product Manager  
Insecticide Branch/Registration Division (7505P)

Date:

*December 17, 2012*

Enclosure



- d) Revise the *Environmental Hazards* statement to read as follows:

“This product is toxic to aquatic organisms including fish and invertebrates. To protect the environment do not allow pesticide to enter or run off into storm drains drainage ditches gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid runoff to water bodies or drainage systems. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.”

- e) On the front panel and on page 2 replace the statement “For use in home gardens, indoor houseplants, greenhouses, and other residential landscapes” with “For use in home gardens, indoor houseplants, greenhouses.”
- f) On page 2 either delete the statement “Repeat treatment as needed” and “May be used on edible crops up to and including day of harvest”.
- g) Add the following use restrictions under the *Use Restrictions* section:
- Do not apply within 21 days of a sulfur application
  - Do not apply more than 10 times per season
  - Not for use in outdoors residential misting systems
- h) Delete the following from the *Outdoor Use* and *Home Greenhouse Use* sections, no data has been cited or submitted to support these uses:
- Sugar beets
  - Soybeans
  - Asparagus
  - Beets
  - Cauliflower
  - Celery
  - Collards
  - Eggplant
  - Kale
  - Mustard greens
  - Peppers
  - Radishes
  - Spinach
  - Squash
  - Olives
  - Blueberry
  - Cranberry
- i) Under the heading *Indoor Use* delete all uses except houseplants.

- j) Replace the statement "Kills exposed egg stages of pests present in dormant season ... etc" with "Kills exposed egg stages of listed pests present in dormant season ... etc" in the *Dormant Use* section.
- k) Revise or delete the following optional marketing claims:
  - Correct the misspelling of "payllids" i.e. "psyllids".
  - Replace "Contact insecticide, ovicide" with "Kills by contact insecticide, ovicide"
  - Replace "Synergy is a contact killer for listed insect pests" with "Synergy kills listed insect pests by contact"
  - Replace "Contact insecticide" with "Kills by contact"
  - Replace "Kills listed insects on contact" with "Kills listed insects by contact"
  - Replace "Kills listed bugs on contact" with "Kills listed bugs by contact"
  - Delete "[May][Can]be used up to and including day of harvest"
  - Delete "This container is made with a minimum X% recycled material"
2. Submit a label showing all pictograms of labeled target pests and use sites for approval before placing on the label.
3. Please note that, should you wish to add a reference to the company's website on your label, the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not be substantially differ from those claims approved through the registration process. Therefore, should the Agency find, or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.
4. Per 40 CFR 156.10(a)(6), submit one copy of your final printed labeling before releasing the product for shipment. As defined in 40 CFR 152.3, "final printed labeling" means the "label or labeling of the product when distributed or sold". Clearly legible reproductions or photo reductions will be accepted for unusual labels. Note that a clean copy of the master label in most cases does not meet the definition of final printed labeling. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander at [www.alexander.bewanda@epa.gov](mailto:www.alexander.bewanda@epa.gov) or (703) 305-7460.

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(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

**(MASTER LABEL)**

**Synergy**

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
DEC 17 2012**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.

89015-1

**(Alternate Brand Names: Synergy – Flower, Fruit & Vegetable Insect Killer; Synergy  
Spider Mite Killer; Spider Mite Killer)**

For use in home gardens, indoor houseplants, greenhouses, and other residential  
landscapes.

**Active Ingredients**

Pyrethrins.....	0.006%
Canola Oil.....	1.350%
<b>Other Ingredients.....</b>	<b>98.644%</b>
<b>Total</b>	<b>100.000%</b>

This product contains 0.1112 lbs. of canola oil and 0.00048 lbs. of pyrethrins per gallon.

**CAUTION**

**KEEP OUT OF REACH OF CHILDREN**

FIRST AID	
<b>IF ON SKIN OR CLOTHING:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific Time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.	

See [back] [other] [side] [panel] for additional precautionary statements.

Manufactured for:  
NPK LLC  
1600 Skypark Drive, Suite 215  
Medford, OR 97504

EPA Reg. No. 89015-X  
EPA Est. No. \_\_\_\_\_

Net Contents:

Batch No. (Note to reviewer: the lot or batch number may also be stamped directly on the product container.)

**Synergy; EPA File Symbol 89015-R**  
MASTER LABEL - Label version (2) - dated August 24 2012  
Initial Proposed Master Label  
Page 1 of 5

## PRECAUTIONARY STATEMENTS

**Hazards to Humans and Domestic Animals:** CAUTION: Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

### User Safety Recommendations

- Users should wash hands with plenty of soap and water before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing immediately if pesticide gets inside, then wash thoroughly and put on clean clothing.

### Environmental Hazards

This product is toxic to aquatic organisms including fish and invertebrates. Do not apply directly to or near water. Drift and run-off may be hazardous to fish in water adjacent to treated areas. Do not contaminate water when disposing of equipment, washwater, or rinsate. See Directions for Use for additional precautions and requirements.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use in home gardens, on home indoor houseplants, home greenhouses, and other residential landscapes. Read entire label. Use only as directed. Shake well before each use. Thoroughly wet all parts of the plants. Do not wet plants to point of runoff or drip. Repeat treatment as needed. May be used on edible crops up to and including day of harvest.

## USE RESTRICTIONS

- Do not allow adults, children, or pets to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.
- Remove pets, birds, and cover fish aquariums before spraying.
- Do not use Synergy spray when temperatures are above 90°F.
- Do not apply more than 1 time per day.
- Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water treated area(s) or apply prior to heavy rainfall.

**Phytotoxicity:** Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar,

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

## **PESTS/SITES AND APPLICATION INSTRUCTIONS**

[Synergy will kill] [Kills] [adelgids], [ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)], [exposed aphids], [apple red bugs], [beetles (blister beetle, Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Mexican bean beetle, spotted cucumber beetle, flea beetle)], [cabbage loopers], [caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers)], [centipedes], [earwigs], [fruittree leafrollers], [fungus gnats], [grape phylloxera], [grubs], [harlequin bugs], [lace bugs], [leafhoppers], [leafminers], [Lygus bugs], [mealybugs], [midges], [millipedes], [moths], [pear psylla], [pillbugs], [phylloxera], [psyllids], [plant bugs], [scale], [sawfly larvae], [silverfish], [sowbugs], [spider mites], [spittlebugs], [springtails], [stinkbugs], [thrips], [whitefly adelgids], [whiteflies], [weevils], [worms (cankerworms, cabbage worms, webworms)], [and eggs of listed insects]

## **OUTDOOR USE**

For use outdoors on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [sugar beets]; [soybeans]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, asparagus, beets, cauliflower, celery, collards, eggplant, lettuce, lima beans, kale, mustard greens, peppers, radishes, spinach, squash)]; [figs]; [olives]; [small fruits (grapes, strawberry, raspberry, blueberry, cranberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 2.5 gal. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

## **HOME GREENHOUSE USE**

For use in home greenhouses on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [sugar beets]; [soybeans]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, asparagus, beets, cauliflower, celery, collards, eggplant, lettuce, lima beans, kale, mustard greens, peppers, radishes, spinach, squash)]; [figs]; [olives]; [small fruits (grapes, strawberry, raspberry, blueberry, cranberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 32 oz. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

## **INDOOR USE**

For use indoors on houseplants and on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [sugar beets]; [soybeans]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, asparagus, beets, cauliflower, celery, collards, eggplant, lettuce, lima beans, kale, mustard greens, peppers, radishes, spinach, squash)]; [figs]; [olives]; [small fruits

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(grapes, strawberry, raspberry, blueberry, cranberry)); [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)].

#### **DORMANT USE**

Kills exposed egg stages of pests present in dormant season and scale insects, spider mites and mealybugs on dormant shrubs (roses), evergreens, fruit trees, and shade trees. Thoroughly wet the dormant plants or trees.

#### **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage and disposal.

(Note to reviewer: The following statements for residential use containers ≤5 gal.)

**STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

(Note to reviewer: The following statements for containers >5 gal. This product is non-dilutable.)

**PESTICIDE STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

[Notice to Buyer: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with label directions.]

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

### **Optional Marketing claims and product information**

(May be presented on the container or supplemental labeling)

- For Homeowner use
- Fast acting
- Dormant and growing season insect spray to kill exposed adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Kills Japanese Beetles
- Kills all accessible stages of listed [crawling] [and] [flying] insects [including eggs].
- Kills all accessible stages of listed insects [including eggs].
- Kills all accessible stages of spider mites [including eggs].
- Contact insecticide, ovicide.
- Kills spider mites, whiteflies, aphids, and all accessible stages of listed insects and eggs
- For roses, flowers, and vegetables
- Contains pyrethrins and canola oil
- For use on plants – indoors and outdoors
- Can use on [flowers], [vegetables], [fruits], and [roses]
- Easy to use
- Insecticide/Miticide
- Insect spray
- [Use on] Roses and flowers
- [Use on] Houseplants and gardens
- [Use on] Fruits and vegetables
- Synergy is a contact killer for listed insect pests.
- Contact insecticide
- For best results, pests must be contacted directly with spray
- Kills listed insects on contact
- Kills listed bugs on contact
- Read entire container label before using this product
- [May] [Can] be used up to and including day of harvest
- Questions, Comments Call XXX-XXX-XXXX
- Made in USA
- This container is made with a minimum X% recycled material
- (Insert company website)
- Some floors may be slippery after spraying
- (Pictograms of labeled target pests and use sites)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND  
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

**TECHNICAL REVIEW BRANCH  
SIMILARITY DETERMINATION**

21/NOV/2012

**MEMORANDUM**

Subject: Name of Pesticide Product: Synergy  
EPA Reg. No. /File Symbol: 89015-R  
DP Barcode: D405127  
Decision No: 468549  
Action Code: R301  
PC Codes: 069001 (pyrethrins)  
011332 (canola oil)

From: Eugenia McAndrew, Biologist  
Technical Review Branch  
Registration Division (7505P)

*E. McAndrew*  
*7/11/12*

To: BeWanda Alexander, RM Team 10  
Insecticide Branch  
Registration Division (7505P)

Applicant: NPK LLC  
1600 Skypark Drive, Suite 215  
Medford, Oregon 97504

**FORMULATION FROM LABEL:**

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Pyrethrins	0.006
Canola Oil	1.350
<u>Other Ingredient(s):</u>	<u>98.644</u>
Total:	100.000%

**ACTION REQUESTED:** The Risk Manager requests: "Please review for substantially similar to EPA Reg. No. 67702-6. Listed are the acute tox data cited in support of the proposed end-use product containing pyrethrins and canola oil."

**BACKGROUND:** NPK LLC has applied for registration of Synergy, EPA File Symbol 89015-R, a knock down ready-to-use insecticide for use on residential landscapes. The submission includes a basic CSF dated November 14, 2012, label, data matrix and company letter. To satisfy the acute toxicity data requirements, the registrant is citing acute toxicity studies submitted for NEU1161, EPA Reg. No. 67702-5, with MRIDs 440769-04, -05, -06, -07 and 4157701 listed on the data matrix. The cited studies were conducted on test material containing 90% canola oil and 2% pyrethrins. These studies were reviewed and classified as acceptable in a Biopesticides and Pollution Prevention Division memo (Zubkoff; D233197; EPA File Symbol 67702-L; 15/DEC/1997). In the same memo, a waiver was granted for the dermal sensitization study.

The registrant is requesting a waiver for the dermal sensitization study for 89015-R based on lack of repeated skin contact as per the labeling.

#### **RECOMMENDATIONS:**

1. TRB compared the formulations of the proposed product, 89015-R, and the cited product, 67702-5, and concluded that the cited acute toxicity studies referenced above may be bridged to the proposed product. A waiver is granted for the dermal sensitization study.

2. The acute toxicity profile for the proposed product, Synergy, EPA File Symbol 89015-R, is as follows:

acute oral toxicity	(LD <sub>50</sub> > 2000 mg/kg)	III	cited	MRID 44076904
acute dermal toxicity	(LD <sub>50</sub> > 2000 mg/kg)	III	cited	MRID 44076905
acute inhalation toxicity	(LC <sub>50</sub> > 2.36 mg/L)	IV	cited	MRID 44157701
primary eye irritation		IV	cited	MRID 44076906
primary skin irritation		III	cited	MRID 44076907
dermal sensitization		neg.	waived	--

3. The proposed basic CSF submitted for 89015-R was reviewed and accepted by the TRB Product Chemistry Team (Gairola; D4051125; EPA File symbol 89015-R; 20/NOV/2012).

**LABELING:** Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

**PRODUCT ID #:** 089015-00001

**PRODUCT NAME:** Synergy

---

**PRECAUTIONARY STATEMENTS**

**SIGNAL WORD:** CAUTION

**Hazards to Humans and Domestic Animals:**

Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

**First Aid:**

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Technology Sciences Group Inc.  
1150 18<sup>th</sup> Street, Suite 1000  
Washington, DC 20036  
Direct: (202) 828-8967  
Fax: (202) 872-0745  
E-Mail: MReynolds@TSGUSA.com



Micah T. Reynolds  
Regulatory Consultant

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

August 9, 2012

**NPK LLC**  
**Submission of Registration Application for**  
**Synergy (EPA File Symbol 89015-R)**

Mr. Richard Gebken, PM-10  
Registration Division (7504P)  
Document Processing Center (APPL)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard, Room S-4900  
2777 South Crystal Drive  
Arlington, Virginia 22202

Dear Mr. Gebken:

Technology Sciences Group, Inc. (TSG), on behalf of NPK LLC, is submitting the enclosed registration application package to register the end-use product, Synergy, containing pyrethrins (CAS Reg. No. 8003-34-7; PC Code 69001) and canola oil (CAS Reg. No. 120962-03-0; PC Code 11332) as its active ingredients. Synergy is intended for use as a knock down ready-to-use insecticide for use on food and non-food plants in home gardens, on indoor houseplants, in greenhouses, and other residential landscapes. Synergy is formulated from a registered source of pyrethrins and canola oil and is substantially similar to a currently registered product (NEU1161 RTU; EPA Reg. No. 67702-6).

Data accompanying this application include product chemistry, and non-compensable data are cited to support the acute toxicity data set. Toxicity data are cited on a concentrated version of the pyrethrins/canola oil combination product (EPA Reg. No. 67702-5), containing 89.5% canola oil and 0.5% pyrethrins. EPA memoranda from December 15, 1997 (DP Barcode No. 233197) and December 24, 1997 (DP Barcode Nos. 233214, D233215, and D233216) bridged toxicity data on the pyrethrins/canola oil concentrate product to a diluted version of the product.

Of the acute toxicity "six-pack", five of the six endpoints were supported by study data while the skin sensitization study was supported by a waiver rationale. This same product is requested to be supported with the same rationale; namely, 1) the results of the acute dermal toxicity study on the concentrated product were >2,000 mg/kg (Tox. Cat. III) and the results of the primary dermal irritation study were determined to be "moderately irritating" (Tox. Cat. III); and 2) the intended use pattern of the product limits dermal contact to any treated surfaces and further instructs users and bystanders to remain clear of any treated area until sprays have dried.

Washington, D.C.  
1150 18<sup>th</sup> St., NW, Suite 1000  
Washington, D.C. 20036  
Phone: (202) 223-4392

California  
712 Fifth St., Suite A  
Davis, CA 95616  
Phone: (530) 757-1245

Canada  
275 Slater St., Suite 900  
Ottawa, Ontario K1P 5H9  
Phone: (613) 247-6285

It is interpreted under PRIA that this registration action should be classified as R301, with a corresponding review time of 4 months. As such, a PRIA pre-payment has been paid and the receipt is enclosed with the other administrative forms. Please find enclosed the following documentation in support of this application:

- 1) Application for Pesticide Registration (EPA Form 8570-1);
- 2) Transmittal document;
- 3) Formulator's Exemption Statement (EPA Form 8570-27);
- 4) Certification with Respect to Citation of Data (EPA Form 8570-34);
- 5) Confidential Statement of Formula (EPA Form 8570-4) (two copies);
- 6) Data Matrix – Confidential & Public Versions (EPA Form 8570-35);
- 7) Certificate with Respect to Label Integrity;
- 8) Copy of Authorization Letter for TSG to Represent NPK LLC;
- 9) Proposed product label (5 copies);
- 10) Electronic Label on CD;
- 11) Data Volumes Supporting Registration (3 copies each);
- 12) PRIA pre-payment receipt: Pay.gov Tracking ID: 257KCG72; Agency Tracking ID: 74344448228.

If you have any questions or require additional information, please do not hesitate to contact me by phone at (202) 828-8967 or via e-mail at [mreynolds@TSGUSA.com](mailto:mreynolds@TSGUSA.com).

Sincerely,



Regulatory Consultant to NPK LLC

Enclosures

CC: R. Townsend (NPK)

## TRANSMITTAL DOCUMENT

### 1. Name and Address of Submitter (Registrant):

EPA Company No. 89015

NPK LLC  
1600 Skypark Drive, Suite 215  
Medford, Oregon 97504

Authorized Representative

Technology Sciences Group, Inc.  
1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, DC 20036  
ATTN: Micah T. Reynolds

### 2. Regulatory Action for which this package is submitted:

Application to Register Synergy (EPA File Symbol 89015-R);  
PRIA Category R301 – New End-Use Product, Substantially Similar to a Registered Product; Registered Source of  
Active Ingredient; Selective Data Citation

### 3. Transmittal Date:

August 9, 2012

### 4. List of Submitted Documents:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
_____	1 of 3	<u>Administrative Materials</u> Cover Letter, Application for Registration Transmittal Document, PRIA Fee Payment Confidential Statement of Formula (2 copies) Formulator's Exemption Statement Certification with Respect to Citation of Data Data Matrix (EP) – confidential & sanitized versions Certificate with Respect to Label Integrity Proposed Product Label (5 copies)	_____
_____	2 of 3	Synergy Chemistry Data/Product Properties – Group A Product Identity, Composition, and Analysis	830 Series 61/62; Group A
_____	3 of 3	Synergy Chemistry Data/Product Properties – Group B Physical and Chemical Characteristics	830 Series 63; Group B

### 5. Company Contact:

Company Name: NPK LLC

Authorized Representative:



Micah T. Reynolds, Regulatory Consultant

Technology Sciences Group, Inc.  
1150 18<sup>th</sup> Street, N.W., Ste. 1000  
Washington, DC 20036  
Tel: (202) 828-8967  
E-mail: [mreynolds@tsqusa.com](mailto:mreynolds@tsqusa.com)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEE

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

**DP BARCODE No.:** D405125 **REG. No. /File Symbol No.** 89015-R **PRODUCT NAME:**  
SYNERGY Code: 011332, 069001 **Decision:** 468549 **Action Code:** R301 **FOOD Use:** [YES]

**DATE OUT:** 11/19/12

**SUBJECT:** End Use Product Chemistry Review  
Product Name: SYNERGY

**FROM:** Indira Gairola, Product Chemistry Team  
Technical Review Branch / Registration Division (7505P)

**TO:** BeWanda Alexander / Richard Gebken PM 10  
Insecticide Branch / Registration Division (7505P)

**Company Name:** NPK, LLC.DBA NPK INDUSTRIES  
**Formulation Type:** Insecticide (LIQUID)

**INTRODUCTION:**

The registrant submitted an application requesting approval of registration of the new end use product "SYNERGY" Applicant claims the subject product to be substantially similar to EPA Reg. No. 67702-6.

TRB has been asked to determine the acceptability of the product chemistry data submitted with (MRID # 489055-01 to -02) for the subject product and the resubmitted basic CSF dated 11/14/12.

**SUMMARY OF FINDINGS:**

1. Name of Active Ingredient(s): Pyrethrins (0.0075%) and Canola Oil (1.35%)
2. Has the registrant claimed substantial similarity to a registered product?  
[ X ] Yes; [ ] No; [ ] NA; if yes give the registration number of the cited product.  
EPA Reg. No. 67702-6
3. All of the source materials of the active ingredient are derived from registered sources-  
[X] Yes [ ] No
4. All inert ingredients have been screened by IIAB and found to be approved for the proposed labeled food uses.

5. Confidential Statement of Formula(s):

☒ Proposed Basic dated – 08/08/12. Resubmitted dated: ☒ 11/14/12

☐ Proposed Alternate ☒ NA

Alternate CSF(s) complies with 40CFR§152.43: ☐ Yes; ☐ No; ☒ [X] NA

6. Product label

- a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2)

☒ Yes; ☐ No; if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs. other ingredient?)

☒ Yes; ☐ No; if not, explain below:

Metallic equivalent: ☐ NA

Isomeric ratios: ☐ Yes ☐ NA

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes ☒ No ☐ NA

Methanol at > 4%: ☐ Yes ☒ No ☐ NA

Sodium nitrate/Sodium nitrite: ☐ Yes ☒ No ☐ NA

- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☒ Yes ☐ No

Since the flash point is 173°F following statement is required on the label

Combustible: "Do not use or store near heat or open flame".

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes, ☐ No; ☒ NA; if not, explain below:

- d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No; if yes explain below:



7. Group A: Product Chemistry Data

TRB's determination of the acceptability of the data for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	CSF 11/14/12. 489055-01
830.1600	Description of materials used to produce the product		X		A	"
830.1650	Description of formulation process		X		A	"
830.1670	Discussion on the formation of impurities		X		A	"
830.1700	Preliminary analysis			NA		489055-01 certified limits stated on the CSF do not match those stated in the data package
830.1750	Certified limits (158.350)	Standard certified Limits	X		U	
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	489055-01

A = Acceptance, N = Not Acceptable, G = Data Gap,  
W = Waiver Request, I = In Progress, NA = Not Applicable, U = Upgradeable.

8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos.
830.6303	Physical State	liquid	A	489055-02
830.6315	Flammability	173°F	A	"
830.6316	Explodability	N/A	W	
830.7000	pH	5.58 (1% soln. in water)	A	"
830.7300	Density (units)	0.997g /ml @ 20 °C	A	"

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request,  
NA = Not applicable, I = In progress, U = Upgradeable.

## CONCLUSIONS:

TRB has reviewed the resubmitted Basic formulation CSF dated 11/14/12 and product and chemistry data corresponding to guideline 830 series, group A & group B for the proposed end use product "SYNERGY" and concluded:

1. The CSF for basic formulation dated 11/14/12 and for Guideline 830.1550 (product identity and composition) are acceptable.
2. Data submitted corresponding to 830 series group A (MRID #489055-01) for product chemistry are acceptable except certified limits in the data package stated do not concur with those stated in the resubmitted basic CSF dated 11/14/12 corrections are required in the data package in order to match the CSF..
3. Data submitted corresponding to 830 series group B (MRID 489055-02) product chemistry data are acceptable except Label.requires revised Statement to read the following :

Combustible: "Do not use or store near heat or open flame".

4. Applicant is required to submit one-year storage stability data (guideline 830.6317) and corrosion characteristics (guideline 830.6320) studies for 0, 3, 6, 9, and 12 month intervals. The results from both study types must be submitted.
5. The subject product is not considered to be similar to EPA Reg. No. 67702-6 from product chemistry point of view, there is difference in % of active ingredients and Flash point. .
6. The proposed label was screened as it pertains to the product chemistry requirements.
7. The final review of the proposed label and uses are the purview of the PM team.



TSG/NPK (89015-R) - Synergy CSF

Micah T. Reynolds

to:

Indira Gairola

10/22/2012 11:52 AM

Cc:

Shyam Mathur

Hide Details

From: "Micah T. Reynolds" <MReynolds@TSGUSA.COM>

\*Product ingredient source information may be entitled to confidential treatment\*

To: Indira Gairola/DC/USEPA/US@EPA

Cc: Shyam Mathur/DC/USEPA/US@EPA

*3.94 gals*

#### 5 Attachments



NPK formulation.xlsx



CSF - Synergy 8 Aug 2012.pdf



PSL-34453-% Oil.pdf



PSL-34453-FAME-canola oil.pdf



PSL-34453-pyrethrins.pdf

Hello Indira:

Thank you for the recent phone conversation to discuss the CSF for Synergy. As discussed via phone, I have the following comments. Understanding that each of the respective active ingredients in Synergy (canola oil and pyrethrins) is sourced from a concentrate product, the August 8, 2012 CSF tries to take that into account, noting the direct quantities of pyrethrins, canola oil, and "other" material from the registered source concentrate (EPA Reg. No. [REDACTED]). The attached spreadsheet file demonstrates how the percentages of canola oil and pyrethrins were calculated for Column 13B of the CSF. Percentages in 13B were first calculated and then the respective quantities for a theoretical batch size of 1,000 pounds were input into Column 13A. Based on known quantities of concentrate and added water, percentages of the active ingredients in Synergy can easily be calculated. These percentages (0.006% pyrethrins and 1.35% canola oil) are corroborated by method development work done at Product Safety Laboratories (raw data attached for reference).

# Completion of 21-Day Content Screen

PM- 10

EPA Reg. # (File Symbol) 89015-A

Decision # D

Data package delivered to  
you on 8/29/12.  
(date)

Jacket/Mini-jacket will be  
transferred to you today.  
(Pick up from Document Center)

Thank you,

Registration Division's 21-Day Content Team

## **Memorandum**

Date: 03 / 21 / 12

To: PM10, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a:

- ☒ fully accepted submission
- ☐ partially accepted submission
- ☐ rejected submission



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

August 21, 2012

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

TECHNOLOGY SCIENCES GROUP, INC  
NPK, LLC DBA NPK INDUSTRIES  
1150 18TH STREET, NW, SUITE 1000  
WASHINGTON, DC 20036

**Report of Analysis for Compliance with PR Notice 11-03**

Thank you for your submittal of 10-AUG-12. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

**Technology Sciences Group Inc.**

115D 18<sup>th</sup> Street, Suite 1000  
Washington, DC 20036  
Direct: (202) 828-8967  
Fax: (202) 872-0745  
E-Mail: MReynolds@TSGUSA.com

**Micah T. Reynolds**  
Regulatory Consultant



**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

August 9, 2012

**NPK LLC**

**Submission of Registration Application for  
Synergy (EPA File Symbol 89015-R)**

Mr. Richard Gebken, PM-10  
Registration Division (7504P)  
Document Processing Center (APPL)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard, Room S-4900  
2777 South Crystal Drive  
Arlington, Virginia 22202

Dear Mr. Gebken:

Technology Sciences Group, Inc. (TSG), on behalf of NPK LLC, is submitting the enclosed registration application package to register the end-use product, Synergy, containing pyrethrins (CAS Reg. No. 8003-34-7; PC Code 69001) and canola oil (CAS Reg. No. 120962-03-0; PC Code 11332) as its active ingredients. Synergy is intended for use as a knock down ready-to-use insecticide for use on food and non-food plants in home gardens, on indoor houseplants, in greenhouses, and other residential landscapes. Synergy is formulated from a registered source of pyrethrins and canola oil and is substantially similar to a currently registered product (NEU1161 RTU; EPA Reg. No. 67702-6).

Data accompanying this application include product chemistry, and non-compensable data are cited to support the acute toxicity data set. Toxicity data are cited on a concentrated version of the pyrethrins/canola oil combination product (EPA Reg. No. 67702-5), containing 89.5% canola oil and 0.5% pyrethrins. EPA memoranda from December 15, 1997 (DP Barcode No. 233197) and December 24, 1997 (DP Barcode Nos. 233214, D233215, and D233216) bridged toxicity data on the pyrethrins/canola oil concentrate product to a diluted version of the product.

Of the acute toxicity "six-pack", five of the six endpoints were supported by study data while the skin sensitization study was supported by a waiver rationale. This same product is requested to be supported with the same rationale; namely, 1) the results of the acute dermal toxicity study on the concentrated product were >2,000 mg/kg (Tox. Cat. III) and the results of the primary dermal irritation study were determined to be "moderately irritating" (Tox. Cat. III); and 2) the intended use pattern of the product limits dermal contact to any treated surfaces and further instructs users and bystanders to remain clear of any treated area until sprays have dried.

**Washington, D.C.**  
115D 18<sup>th</sup> St., NW, Suite 1000  
Washington, D.C. 20036  
Phone: (202) 223-4392

**California**  
712 Fifth St., Suite A  
Davis, CA 95616  
Phone: (530) 757-1245

**Canada**  
275 Slater St., Suite 900  
Ottawa, Ontario K1P 5H9  
Phone: (613) 247-6285

It is interpreted under PRIA that this registration action should be classified as R301, with a corresponding review time of 4 months. As such, a PRIA pre-payment has been paid and the receipt is enclosed with the other administrative forms. Please find enclosed the following documentation in support of this application:

- 1) Application for Pesticide Registration (EPA Form 8570-1);
- 2) Transmittal document;
- 3) Formulator's Exemption Statement (EPA Form 8570-27);
- 4) Certification with Respect to Citation of Data (EPA Form 8570-34);
- 5) Confidential Statement of Formula (EPA Form 8570-4) (two copies);
- 6) Data Matrix – Confidential & Public Versions (EPA Form 8570-35);
- 7) Certificate with Respect to Label Integrity;
- 8) Copy of Authorization Letter for TSG to Represent NPK LLC;
- 9) Proposed product label (5 copies);
- 10) Electronic Label on CD;
- 11) Data Volumes Supporting Registration (3 copies each);
- 12) PRIA pre-payment receipt: Pay.gov Tracking ID: 257KCG72; Agency Tracking ID: 74344448228.

If you have any questions or require additional information, please do not hesitate to contact me by phone at (202) 828-8967 or via e-mail at [mreynolds@TSGUSA.com](mailto:mreynolds@TSGUSA.com).

Sincerely,



Regulatory Consultant to NPK LLC

Enclosures

CC: R. Townsend (NPK)





**TRANSMITTAL DOCUMENT**

**1. Name and Address of Submitter (Registrant):**

**EPA Company No. 89015**

**Authorized Representative**

**NPK LLC**  
1600 Skypark Drive, Suite 215  
Medford, Oregon 97504

**Technology Sciences Group, Inc.**  
**1150 18<sup>th</sup> Street, NW, Suite 1000**  
**Washington, DC 20036**  
**ATTN: Micah T. Reynolds**

**2. Regulatory Action for which this package is submitted:**

**Application to Register Synergy (EPA File Symbol 89015-R);  
PRIA Category R301 – New End-Use Product, Substantially Similar to a Registered Product; Registered Source of  
Active Ingredient; Selective Data Citation**

**3. Transmittal Date:**

**August 9, 2012**

#### 4. List of Submitted Documents:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
_____	1 of 3	<u>Administrative Materials</u> Cover Letter, Application for Registration Transmittal Document, PRIA Fee Payment Confidential Statement of Formula (2 copies) Formulator's Exemption Statement Certification with Respect to Citation of Data Data Matrix (EP) – confidential & sanitized versions Certificate with Respect to Label Integrity Proposed Product Label (5 copies)	-----
<u>48905501</u>	2 of 3	Synergy Chemistry Data/Product Properties – Group A Product Identity, Composition, and Analysis	830 Series 61/62; Group A
<u>48905502</u>	3 of 3	Synergy Chemistry Data/Product Properties – Group B Physical and Chemical Characteristics	830 Series 63; Group B

**5. Company Contact:**

**Company Name:** NPK LLC

**Authorized Representative:**

**Micah T. Reynolds, Regulatory Consultant**

**Technology Sciences Group, Inc.**  
1150 18<sup>th</sup> Street, N.W., Ste. 1000  
Washington, DC 20036  
Tel: (202) 828-8967  
E-mail: [mreynolds@tsqusa.com](mailto:mreynolds@tsqusa.com)

[illegible]

NEW APPLICATIONS

DATE: 08-10-2012

FILE NUMBER: 89015-R

FEP (OPP IN ENTRY) SB AUG 10 2012  
(Initial & date)

FILE ROOM: \_\_\_\_\_  
(Initial & date)

SIG: \_\_\_\_\_  
(Initial & date)

FILE ROOM: \_\_\_\_\_  
(Initial & date)

✓ ASSIGN TO PM 10 (NO DATA)

\_\_\_\_ JACKET TO SHELF (DATA)

**21-Day Screen Completed by**  
**Contractor**

**21-Day Expires on** 8/31/12

**Jacket #** 89015-R

**MRID#** 489055

**Content Screen:** Recommend to Pass/Fail

**11-3 Review:** Pass/Fail/NA

**Overall Status:** Recommend to Pass/Fail

**Transfer This Jacket to:**

Steve Schabile

# PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

21 Day Screen Start Date: 8-10-12 <sup>3/23/09</sup>  
 Experts In-Processing Signature: B. [Signature] Date 8-15-12 Fee Paid: Yes ☒  
 Division management contacted on issues No ☐ Yes ☐ Date \_\_\_\_\_

EPA Reg. Number: <u>89015-R</u>		EPA Receipt Date: <u>8-10-12</u>				
Items for Review				Yes	No	N/A*
1	<b>Application Form</b> (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	<b>Confidential Statement of Formula</b> all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to <a href="http://www.epa.gov/opprd001/inerts/">http://www.epa.gov/opprd001/inerts/</a> ), including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
	no inerts					
3	<b>Certification with Respect to Citation of Data</b> (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	<b>Formulator's Exemption Statement</b> (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	<b>Data Matrix</b> (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	<b>5 Copies of Label</b> (link to <a href="http://www.epa.gov/oppfead1/labeling/lrm/">http://www.epa.gov/oppfead1/labeling/lrm/</a> ) (Electronic labels on CD are encouraged and guidance is available)( link to <a href="http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels">http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels</a> )			X		

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	✓		
8	Notice of Filing (link to <a href="http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm">http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm</a> ) included with petitions (link to <a href="http://www.epa.gov/pesticides/regulating/tolerances.htm">http://www.epa.gov/pesticides/regulating/tolerances.htm</a> )			X
9	If applicable for conventional applications, reduced risk rationale (link to <a href="http://www.epa.gov/opprd001/workplan/reducedrisk.html">http://www.epa.gov/opprd001/workplan/reducedrisk.html</a> )			X
10	Required Data (link to <a href="http://www.epa.gov/pesticides/regulating/data_requirements.htm">http://www.epa.gov/pesticides/regulating/data_requirements.htm</a> ) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

- \* Studies passed PRN 1103 review.
- \* Technical and water only, no inerts to review.
- \* Registrant was contacted to provide efficacy data since houseflies, ticks, wasps and mites were listed on the product label 8124. Registrant later provided a revised label to not include said pests.

Jacket passed.

MRID 489055

\* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to <http://www.epa.gov/oppr001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at [inertsbranch@epa.gov](mailto:inertsbranch@epa.gov) and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to [http://www.epa.gov/oppbppd1/biopesticides/contacts\\_bppd.htm](http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm)].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/oppr001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.



3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Script for Rejection Phone calls

**Contact Name:** Micah T. Reynolds

**Phone #:** 202-828-8967

**Email:** mreynolds@tsusa.com

**First Call/Initials:**

**Date:** 8/24/12 *en*

**Time:** 8:08 AM

**Second Call/Initials:**

**Date:**

**Time:**

This is Elizabeth Nguyen, EPA contractor.

I'm calling regarding your submission in support of

Synergy (Reg# 39015-R).

We have found the following deficiencies regarding:

PR Notice 86.5: Yes or No

Volume/Study Title:

Volume/Study Title:

Volume/Study Title:

Additional volumes continued on back of page: Yes or No

Application Package: Yes or No

must provide efficacy data and include it in the Data Matrices  
→ Registrant updated label to remove Pests of Sig Public Health Importance

These deficiencies have been approved by EPA.

The corrections can be faxed to 703-305-5060/Attn: \_\_\_\_\_.

**Second Call/Email:**

If we do not receive the corrections by \_\_\_\_\_, we will process your submission, accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.



RE: EPA Submission: Synergy (Reg# 89015-R)

Micah T. Reynolds

to:

Elizabeth Nguyen

08/24/2012 12:44 PM

Cc:

Sree Nair, Stephen Schaible

Hide Details

From: "Micah T. Reynolds" <MReynolds@TSGUSA.COM>

To: Elizabeth Nguyen/DC/USEPA/US@EPA

Cc: Sree Nair/DC/USEPA/US@EPA, Stephen Schaible/DC/USEPA/US@EPA

### 3 Attachments



image001.gif 089015-xxxxx.20120824.clean.pdf 089015-xxxxx.20120824.redline.pdf

Hi Elizabeth:

Following our e-mail exchange earlier this morning, please find attached a redline version and replacement clean version of the Synergy label that deletes references to public health pests (including ticks, wasps, and houseflies). Also, the unqualified "mite" claim has been replaced throughout with the specific "spider mite".

I hope these changes are sufficient for continued review of the application. I also hope that through the removal of these public health pests that the application can be redesignated from R310 back to R301 since the product and labeled uses are substantially similar to the referenced Neudorff's NEU1161 RTU product (EPA Reg. No. 67702-6).

Many thanks,

Micah T. Reynolds | Regulatory Consultant  
Technology Sciences Group Inc. (TSG)

1150 18<sup>th</sup> Street, NW, Suite 1000 | Washington, DC 20036  
 Tel: 202.828.8967 | Fax: 202.872.0745 | [mreynolds@TSGUSA.com](mailto:mreynolds@TSGUSA.com)  
 Visit us at [www.TSGUSA.com](http://www.TSGUSA.com)

**From:** Elizabeth Nguyen [<mailto:Nguyen.Elizabeth@epamail.epa.gov>]

**Sent:** Friday, August 24, 2012 10:00 AM

**To:** Micah T. Reynolds

**Subject:** RE: EPA Submission: Synergy (Reg# 89015-R)

Hi Micah,

The best way to transmit the label to me would be through email, but you can also send it via fax at the number below.

Thank you,

**Elizabeth Nguyen**

EPA Contractor  
 2777 Crystal Drive, S-4828  
 One Potomac Yard  
 Arlington, VA 22202  
 703-305-6177 (p)  
 703-305-5060 (f)  
[nguyen.elizabeth@epa.gov](mailto:nguyen.elizabeth@epa.gov)

▼ "Micah T. Reynolds" ---08/24/2012 09:43:59 AM---HI Elizabeth: Thanks very much for noting those pests in the Synergy label. I think I can easily pr

From: "Micah T. Reynolds" <[MReynolds@TSGUSA.COM](mailto:MReynolds@TSGUSA.COM)>  
 To: Elizabeth Nguyen/DC/USEPA/US@EPA  
 Cc: Sree Nair/DC/USEPA/US@EPA  
 Date: 08/24/2012 09:43 AM  
 Subject: RE: EPA Submission: Synergy (Reg# 89015-R)

HI Elizabeth:

Thanks very much for noting those pests in the Synergy label. I think I can easily provide an updated label dropping houseflies, ticks, wasps, and further defining or limiting the "mite" organisms. I must first reach out to the registrant and confirm, but I believe I could have a revised label later today or Monday.

How should I best transmit?

**Micah T. Reynolds | Regulatory Consultant**  
**Technology Sciences Group Inc. (TSG)**

1150 18<sup>th</sup> Street, NW, Suite 1000 | Washington, DC 20036  
 Tel: 202.828.8967 | Fax: 202.872.0745 | [mreynolds@TSGUSA.com](mailto:mreynolds@TSGUSA.com)  
 Visit us at [www.TSGUSA.com](http://www.TSGUSA.com)

**From:** Elizabeth Nguyen [<mailto:Nguyen.Elizabeth@epamail.epa.gov>]

**Sent:** Friday, August 24, 2012 9:30 AM  
**To:** Micah T. Reynolds  
**Cc:** [nair.sree@epa.gov](mailto:nair.sree@epa.gov)  
**Subject:** RE: EPA Submission: Synergy (Reg# 89015-R)

Dear Micah,

The list of pests included: houseflies, ticks, wasps and mites; although, the label did not specifically list the type of tick, wasp or mite.

### Elizabeth Nguyen

EPA Contractor  
 2777 Crystal Drive, S-4828  
 One Potomac Yard  
 Arlington, VA 22202  
 703-305-6177 (p)  
 703-305-5060 (f)  
[nguyen.elizabeth@epa.gov](mailto:nguyen.elizabeth@epa.gov)

"Micah T. Reynolds" ---08/24/2012 09:09:14 AM---Dear Elizabeth: Please confirm whether houseflies was the only pest of significant public health con

From: "Micah T. Reynolds" <[MReynolds@TSGUSA.COM](mailto:MReynolds@TSGUSA.COM)>  
 To: Elizabeth Nguyen/DC/USEPA/US@EPA  
 Cc: Sree Nair/DC/USEPA/US@EPA  
 Date: 08/24/2012 09:09 AM  
 Subject: RE: EPA Submission: Synergy (Reg# 89015-R)

---

Dear Elizabeth:

Please confirm whether houseflies was the only pest of significant public health concern on the draft Synergy label you reviewed. If so, it is likely that the registrant will remove that claim and submit just a new label.

Thank you,

**Micah T. Reynolds | Regulatory Consultant**  
**Technology Sciences Group Inc. (TSG)**

1150 18<sup>th</sup> Street, NW, Suite 1000 | Washington, DC 20036  
 Tel: 202.828.8967 | Fax: 202.872.0745 | [mreynolds@TSGUSA.com](mailto:mreynolds@TSGUSA.com)  
 Visit us at [www.TSGUSA.com](http://www.TSGUSA.com)

**From:** Elizabeth Nguyen [<mailto:Nguyen.Elizabeth@epamail.epa.gov>]  
**Sent:** Friday, August 24, 2012 8:09 AM  
**To:** Micah T. Reynolds  
**Cc:** [nair.sree@epa.gov](mailto:nair.sree@epa.gov)  
**Subject:** EPA Submission: Synergy (Reg# 89015-R)

Dear Mr. Micah T. Reynolds,

This email is to address one issue found regarding your application for registration of submission Synergy (Reg# 89015-R).

- Based on the labels submitted, Efficacy data are required to be submitted/cited since there is mention about Pests of Significant Public Health Information (houseflies). When these Efficacy data are submitted/cited, please update the Data Matrices for inclusion of the Efficacy data.

Please verify this and send the information either by email or to our secure fax line at 703-305-5060. Please contact me if you have any questions.

Sincerely,

**Elizabeth Nguyen**

EPA Contractor  
2777 Crystal Drive, S-4828  
One Potomac Yard  
Arlington, VA 22202  
703-305-6177 (p)  
703-305-5060 (f)  
[nguyen.elizabeth@epa.gov](mailto:nguyen.elizabeth@epa.gov)

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# R 310

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGA).  
Must submit Group A and B product chemistry data for each proposed product unless it's a 100% identical (repack): YES or NO (circle one)

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted		MP Data Submitted		TGA	
		Yes	No	Yes	No	Yes	No
830.1550	Product Identity & Composition	X					
830.1600	Description of materials used to produce the product	X					
830.1650	Description of formulation process	X					
830.1670	Discussion on the formation of impurities	X					
830.1700	Preliminary analysis		NA				
830.1750	Certified limits (158.345)	X					
830.1800	Enforcement analytical method	X					

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted		MP Data Submitted		TGA	
		Yes	No	Yes	No	Yes	No
830.6302	Color	X					
830.6303	Physical State	X					
830.6304	Odor	X					
830.6313	Stability to normal and elevated temperatures metal and metal ions						
830.6314	Oxidation/Reduction (Chemical incompatibility)		waiver				
830.6315	Flammability	X					
830.6316	Explosibility		waiver				
830.6317	Storage stability	X					
830.6319	Miscibility		NIA				
830.6320	Corrosion Characteristics	X					
830.6321	Dielectric Breakdown Voltage		NIA				
830.7000	pH	X					
830.7050	UV/ Visible Absorption						
830.7100	Viscosity	X					
830.7200	Melting Point						
830.7220	Boiling Point						
830.7300	Density	X					
830.7370	Dissociation Constant						
830.7550	Partition Coefficient						
830.7840	Water Solubility						
830.7950	Vapor Pressure						

Grayed out = data not required



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

August 14, 2012

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT**

Or Pay On-Line at [www.Pay.Gov](http://www.Pay.Gov) (See Below for Details)

OPP Decision Number: D-468549  
EPA File Symbol or Registration Number: 89015-R  
Product Name: SYNERGY  
EPA Receipt Date: 10-Aug-2012  
EPA Company Number: 89015  
Company Name: NPK, LLC DBA NPK INDUSTRIES

MICAH T. REYNOLDS  
TECHNOLOGY SCIENCES GROUP, INC  
NPK, LLC DBA NPK INDUSTRIES  
1150 18TH STREET, NW, SUITE 1000  
WASHINGTON, DC 20036-

**SUBJECT: Receipt of Registration Application Subject to Registration Service Fee**

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The action has been identified as action code R310:

**NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT  
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);**

Please remit payment in the amount of \$3,087 (fee for action code R310 is \$4,807 minus payment of \$1,720) within 14 days to:

By USPS:

USEPA Washington Finance Center  
Pesticide Registration Service Fee  
PO Box 979074  
St. Louis, MO 63197-9000



By Courier:  
U.S. Bank  
Government Lockbox 979074  
1005 Convention Plaza  
SL-MO-C2-GL  
St. Louis, MO 63197  
Telephone: (314) 418-4990

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit [www.pay.gov](http://www.pay.gov). From the [pay.gov](http://www.pay.gov) home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a partial waiver of the registration service fee if, for example, you qualify as a small business. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at [www.epa.gov/pesticides/fees](http://www.epa.gov/pesticides/fees).

Please send Registration Service Fee Waiver requests to:

By USPS:  
Document Processing Desk (WAIVER)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

By Courier:  
Document Processing Desk (WAIVER)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room S4900 Potomac Yard 1  
2777 S. Crystal Dr.  
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 14 days, the Agency will presume that you no longer want to pursue this action. The Agency will then reject your application and issue an invoice for any applicable outstanding fees.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,



Front End Processing Staff  
Information Technology & Resources Management Division

**Fee for Service**

AK  
{921800k~

This package includes the following

☒ New Registration

☐ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: \_\_\_\_

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr. 10

Receipt No.

S- 921800

EPA File Symbol/Reg. No.

89015-R

Pin-Punch Date:

8/10/2012

☐ This item is NOT subject to FFS action.

Action Code:

Requested: B301

Granted: B310

Amount Due: \$ 4801

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: S. H. Kover

Date: Aug 13 2012

Remarks: includes estimate for budget data

Receipt for Section 3

S: 921800

Regulatory Type: Product Registration - Section 3

Application Type: New Registration

Company: 89015 NPK, LLC DBA NPK INDUSTRIES

Risk Manager: Registration Division, Risk Management Team 10

Product #: 89015-R

Product Name: SYNERGY

Override#:

Me Too Section3: 67702-6

Me Too Product Name: NEU1161 RTU

Application Date: 09-Aug-2012

Front End Date: 10-Aug-2012

FFS Due Date:

OPP Target Date:

Fast Track:

Receipt Description: NEW REGISTRATION

Form A:

Signature Date:

Resubmission: Yes No

Fee For Service: Yes No

Billable: Yes No

V

OPP Rec'vd Date: 10-Aug-2012

Risk Manager Send Date:

Negotiated Due Date:

New Ingredient:

Request Date:

New Ingredient:

Received Date:

Signature Date:

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Study

CSF

View/Edit

## Online Payment

## Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

## Pay.gov Tracking Information

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 257KCG72

Agency Tracking ID: 74344448228

Transaction Date and Time: 08/10/2012 08:48 EDT

## Payment Summary

## Address Information

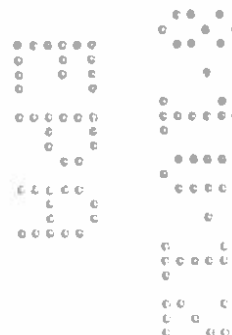
Account Holder Name: Micah Reynolds  
1150 18th Street  
Billing Address: NW  
Billing Address 2: Suite 1000  
City: Washington  
State / Province: DC  
Zip / Postal Code: 20036  
Country: USA



## Account Information

American  
Card Type: Express  
Card Number: \*\*\*\*\*1527  
Decision Number:  
Registration Number: 89015-R  
Company Name: NPK LLC  
Company Number: 89015  
Action Code: R301

## Payment Information

Payment Amount: \$1,720.00  
Transaction Date 08/10/2012  
and Time: 08:48 EDT



	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input checked="" type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input type="checkbox"/> <b>Other</b>	OPP Identifier Number	
<b>Application for Pesticide – Section I</b>				
1. Company/Product Number <b>89015-R</b>		2. EPA Product Manager <b>Richard Gebken</b>		
4. Company/Product (Name) <b>Synergy</b>		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted		
5. Name And Address Of Applicant (Include ZIP Code) <b>NPK LLC</b> <b>1600 Skypark Drive, Suite 215</b> <b>Medford, Oregon 97504</b> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <b>67702-6</b> Product Name <b>NEU1161 RTU</b>		
<b>Section II</b>				
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification – Explain below. <input type="checkbox"/> Other – Explain Below.				
<b>Explanation:</b> Use additional page(s) if necessary. (For section I and Section II.) <b>Submission of Application for Registration of New End-use Product, Substantially Similar to a Registered Product; Registered Source of Active Ingredient; Selective Data Citation.</b> It is our interpretation of PRIA that this action is classified as R301. A PRIA pre-payment has been made for this action and receipt included in this application (Pay.Gov Tracking ID: 257KCG72; Agency Tracking ID: 74344448228). A small business waiver request is enclosed with this submission. Please confirm receipt with Micah Reynolds: <a href="mailto:mreynolds@tsqusa.com">mreynolds@tsqusa.com</a> , via phone (202) 828-8967, or via fax (202) 872-0745.				
<b>Section III</b>				
t. Material This Product Will Be Packaged In:				
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No <b>* Certification must be submitted</b>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes"                      No. per Unit Packaging wgt.                      Container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes"                      No. per Unit Packaging wgt.                      Container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container <b>16 fl. Oz., 24 fl. Oz., 32 fl. Oz., 1 gal, 2.5 gal, 5 gal, 15 gal, 55 gal, 260 gal</b>		
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____		
<b>Section IV</b>				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name <b>Micah T. Reynolds, Technology Sciences Group, Inc.</b>		Title <b>Regulatory Consultant</b>		
		Telephone No. (Include Area Code) <b>(202) 823-8967</b>		
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			3. Date Application Received (Stamped) <div style="border: 1px solid black; width: 100px; height: 100px; margin: 10px auto;"></div>	
2. Signature 		3. Title <b>Regulatory Consultant to NPK LLC</b>		
4. Typed Name <b>Micah T. Reynolds</b>		5. Date <b>August 9, 2012</b>		



United States  
Environmental Protection Agency  
Washington, DC 20460

# Formulators' Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address  NPK LLC 1600 Skypark Drive, Suite 215 Medford, Oregon 97504	EPA File symbol/Registration Number  <b>89015-R</b>
	Product Name <b>Synergy</b>
	Date of Confidential Statement of Formula (EPA Form 8570-4) <b>August 8, 2012</b>

As an authorized representative of the applicant for registration of the product identified above, I certify that :

- (1) This product contains the following active ingredient(s):

## Pyrethrins (PC Code 69001) & Canola Oil (PC Code 11332)

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

- (3) Indicate by checking (A) or (B) below which paragraph applies:

- ☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- ☐ (B) The Confidential Statement of Formula (CSF) (EPA FORM 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Permethrin & Canola Oil		 
Signature 	Name and Title Micah T. Reynolds, Regulatory Consultant to NPK LLC	Date <b>August 9, 2012</b>

**Technology Sciences Group Inc.**

1150 18<sup>th</sup> Street, Suite 1000  
Washington, DC 20036  
Direct: (202) 828-8967  
Fax: (202) 872-0745  
E-Mail: MReynolds@TSGUSA.com

**Micah T. Reynolds**  
Regulatory Consultant



**CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

August 9, 2012

**NPK LLC**  
**Submission of Registration Application for**  
**Synergy (EPA File Symbol 89015-R)**

Mr. Richard Gebken, PM-10  
Registration Division (7504P)  
Document Processing Center (APPL)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard, Room S-4900  
2777 South Crystal Drive  
Arlington, Virginia 22202

Dear Mr. Gebken:

Technology Sciences Group, Inc. (TSG), on behalf of NPK LLC, is submitting the enclosed registration application package to register the end-use product, Synergy, containing pyrethrins (CAS Reg. No. 8003-34-7; PC Code 69001) and canola oil (CAS Reg. No. 120962-03-0; PC Code 11332) as its active ingredients. Synergy is intended for use as a knock down ready-to-use insecticide for use on food and non-food plants in home gardens, on indoor houseplants, in greenhouses, and other residential landscapes. Synergy is formulated from a registered source of pyrethrins and canola oil and is substantially similar to a currently registered product (NEU1161 RTU; EPA Reg. No. 67702-6).

Data accompanying this application include product chemistry, and non-compensable data are cited to support the acute toxicity data set. Toxicity data are cited on a concentrated version of the pyrethrins/canola oil combination product (EPA Reg. No. 67702-5), containing 89.5% canola oil and 0.5% pyrethrins. EPA memoranda from December 15, 1997 (DP Barcode No. 233197) and December 24, 1997 (DP Barcode Nos. 233214, D233215, and D233216) bridged toxicity data on the pyrethrins/canola oil concentrate product to a diluted version of the product.

Of the acute toxicity "six-pack", five of the six endpoints were supported by study data while the skin sensitization study was supported by a waiver rationale. This same product is requested to be supported with the same rationale; namely, 1) the results of the acute dermal toxicity study on the concentrated product were >2,000 mg/kg (Tox. Cat. III) and the results of the primary dermal irritation study were determined to be "moderately irritating" (Tox. Cat. III); and 2) the intended use pattern of the product limits dermal contact to any treated surfaces and further instructs users and bystanders to remain clear of any treated area until sprays have dried.

**Washington, D.C.**  
1150 18<sup>th</sup> St., NW, Suite 1000  
Washington, D.C. 20036  
Phone: (202) 223-4392

**California**  
712 Fifth St., Suite A  
Davis, CA 95616  
Phone: (530) 757-1245

**Canada**  
275 Slater St., Suite 900  
Ottawa, Ontario K1P 5H9  
Phone: (613) 247-6285



It is interpreted under PRIA that this registration action should be classified as R301, with a corresponding review time of 4 months. As such, a PRIA pre-payment has been paid and the receipt is enclosed with the other administrative forms. Please find enclosed the following documentation in support of this application:

- 1) Application for Pesticide Registration (EPA Form 8570-1);
- 2) Transmittal document;
- 3) Formulator's Exemption Statement (EPA Form 8570-27);
- 4) Certification with Respect to Citation of Data (EPA Form 8570-34);
- 5) Confidential Statement of Formula (EPA Form 8570-4) (two copies);
- 6) Data Matrix – Confidential & Public Versions (EPA Form 8570-35);
- 7) Certificate with Respect to Label Integrity;
- 8) Copy of Authorization Letter for TSG to Represent NPK LLC;
- 9) Proposed product label (5 copies);
- 10) Electronic Label on CD;
- 11) Data Volumes Supporting Registration (3 copies each);
- 12) PRIA pre-payment receipt: Pay.gov Tracking ID: 257KCG72; Agency Tracking ID: 74344448228.

If you have any questions or require additional information, please do not hesitate to contact me by phone at (202) 828-8967 or via e-mail at [mreynolds@TSGUSA.com](mailto:mreynolds@TSGUSA.com).

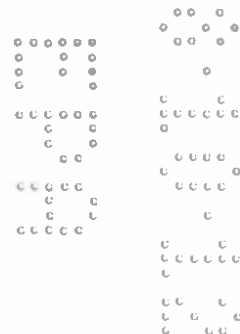
Sincerely,



Regulatory Consultant to NPK LLC

Enclosures

CC: R. Townsend (NPK)



## TRANSMITTAL DOCUMENT

### 1. Name and Address of Submitter (Registrant):

#### EPA Company No. 89015

NPK LLC  
1600 Skypark Drive, Suite 215  
Medford, Oregon 97504

#### Authorized Representative

Technology Sciences Group, Inc.  
1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, DC 20036  
ATTN: Micah T. Reynolds

### 2. Regulatory Action for which this package is submitted:

Application to Register Synergy (EPA File Symbol 89015-R);  
PRIA Category R301 – New End-Use Product, Substantially Similar to a Registered Product; Registered Source of  
Active Ingredient; Selective Data Citation

### 3. Transmittal Date:

August 9, 2012

### 4. List of Submitted Documents:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
_____	1 of 3	<u>Administrative Materials</u> Cover Letter, Application for Registration Transmittal Document, PRIA Fee Payment Confidential Statement of Formula (2 copies) Formulator's Exemption Statement Certification with Respect to Citation of Data Data Matrix (EP) – confidential & sanitized versions Certificate with Respect to Label Integrity Proposed Product Label (5 copies)	-----
_____	2 of 3	Synergy Chemistry Data/Product Properties – Group A Product Identity, Composition, and Analysis	830 Series 61/62; Group A
_____	3 of 3	Synergy Chemistry Data/Product Properties – Group B Physical and Chemical Characteristics	830 Series 63; Group B

### 5. Company Contact:

Company Name: NPK LLC

Authorized Representative:



Micah T. Reynolds, Regulatory Consultant

Technology Sciences Group, Inc.  
1150 18<sup>th</sup> Street, N.W., Ste. 1000  
Washington, DC 20036  
Tel: (202) 828-8967  
E-mail: [mreynolds@tsgusa.com](mailto:mreynolds@tsgusa.com)

**NPK INDUSTRIES**

November 18, 2011

Document Processing Desk (NEWCO)  
 Office of Pesticide Programs (7504P)  
 U.S. Environmental Protection Agency  
 Room S-4900, One Potomac Yard  
 2777 South Crystal Drive  
 Arlington, Virginia 22202

**RE: NPK, LLC DBA NPK Industries**  
**Request for Company Number and Letter of Authorization**

In preparation for submission of pesticide product registrations, NPK, LLC (NPK), of the address identified below, hereby requests assignment of an EPA Company Number. In addition, NPK has an agreement with Technology Sciences Group Inc. (TSG) to provide regulatory assistance regarding the registration of pesticide products. With this letter, we confirm TSG as an authorized agent in all matters concerning the registration of pesticide products with the Agency. This letter constitutes authorization for the Office of Pesticide Programs to discuss the status of these registrations and supporting data with representatives of TSG, including disclosure of trade secret information, and acknowledges that official correspondence from the Office of Pesticide Programs can be directed to the agent. The full name and mailing address of the agent is also identified below.

**Company Information:**

NPK, LLC DBA NPK Industries  
 1904 United Way, Suite 104  
 Medford, OR 97504  
 (541) 944-5832

**Agent Information:**

Micah T. Reynolds  
 Technology Sciences Group Inc.  
 1150 18<sup>th</sup> Street, NW, Suite 1000  
 Washington, DC 20036  
 Tel: (202) 828-8987  
 Fax: (202) 872-0745  
 Email: [mreynolds@tsqua.com](mailto:mreynolds@tsqua.com)

If there are any questions or additional information or clarification is required, please do not hesitate to contact me by phone at (541) 944-5832 or by e-mail at [Reny@NPK-Industries.com](mailto:Reny@NPK-Industries.com).

Sincerely,



Reny Townsend  
 Senior Vice President / Partner

CC: M. Reynolds (TSG)



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2137T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number

**NPK LLC**

**1600 Skypark Drive, Suite 215**

**Medford, Oregon 97504**

**Tel: (202) 828-8967**

EPA Registration Number/File Symbol

**89015-R**

Active Ingredient(s) and/or representative test compound(s)

**Pyrethrins (PC Code 69001) & Canola Oil (PC Code 11332)**

Date

**August 9, 2012**

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)

**Residential Outdoor, Indoor, Indoor Greenhouse**

Product Name

**Synergy**

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).



I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**



I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).



I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]



I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter, or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

*Micah T. Reynolds*

Date

**August 9, 2012**

Typed or Printed Name and Title

**Micah T. Reynolds, Regulatory Consultant**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date	August 9, 2012	EPA Reg. No./File Symbol	89015-R	Page 1 of 3	
Applicant's/Registrant's Name & Address:		Product			
NPK LLC 1600 Skypark Drive, Suite 215 Medford, Oregon 97504		Synergy			
Ingredient Pyrethrins (CAS Reg. No. 8003-34-7; PC code 69001) & Canola Oil (CAS Reg. No. 120962-03-0; PC Code 11332)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>PRODUCT CHEMISTRY:</b>					
830.1550 (40 CFR §158.320)	Product Composition	Volume 2, this submission	NPK LLC	OWN	
830.1600 (40 CFR §158.325)	Description of Materials Used to Produce the Product	Volume 2, this submission	NPK LLC	OWN	
830.1620 (40 CFR §158.330)	Description of Production Process		N/A – Product is formulated.		
830.1650 (40 CFR §158.335)	Description of Formulation Process	Volume 2, this submission	NPK LLC	OWN	
830.1670 (40 CFR §158.340)	Discussion of Formation of Impurities	Volume 2, this submission	NPK LLC	OWN	
830.1700 (40 CFR §158.345)	Preliminary Analysis (TGA1; EP integrated)		N/A – Product is formulated.		
830.1750 (40 CFR §158.350)	Certified Limits	Volume 2, this submission	NPK LLC	OWN	
830.1800 (40 CFR §158.355)	Enforcement Analytical Method	Volume 2, this submission	NPK LLC	OWN	
830.1900	Submittal of Samples		Available upon request		
830.6302	Color	Volume 3, this submission	NPK LLC	OWN	
830.6303	Physical State	Volume 3, this submission	NPK LLC	OWN	
830.6304	Odor	Volume 3, this submission	NPK LLC	OWN	
830.6313	Stability to temperature, metals, and metal ions	Volume 3, this submission	NPK LLC	OWN	
Signature			Name and Title Micah T. Reynolds, Regulatory Consultant to NPK LLC		Date August 9, 2012




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to Director: OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date	August 9, 2012	EPA Reg. No./File Symbol	89015-R	Page 2 of 3	
Applicant's/Registrant's Name & Address:		Product			
NPK LLC 1600 Skypark Drive, Suite 215 Medford, Oregon 97504		Synergy			
Ingredient Pyrethrins (CAS Reg. No. 8003-34-7; PC code 69001) & Canola Oil (CAS Reg. No. 120962-03-0; PC Code 11332)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>PRODUCT CHEMISTRY:</b>					
830.6314	Oxidizing or Reducing Action	Volume 3, this submission	NPK LLC	OWN	
830.6315	Flammability	Volume 3, this submission	NPK LLC	OWN	
830.6316	Explosibility	Volume 3, this submission	NPK LLC	OWN	
830.6317	Storage Stability	Volume 3, this submission	NPK LLC	OWN	
830.6319	Miscibility	Volume 3, this submission	NPK LLC	OWN	
830.6320	Corrosion Characteristics	Volume 3, this submission	NPK LLC	OWN	
830.6321	Dielectric Breakdown Voltage	Volume 3, this submission	NPK LLC	OWN	
830.7000	pH	Volume 3, this submission	NPK LLC	OWN	
830.7050	UV/Visible Light Absorption		Not Required for End-use Products.		
830.7100	Viscosity	Volume 3, this submission	NPK LLC	OWN	
830.7200	Melting Point	Volume 3, this submission	NPK LLC	OWN	
830.7220	Boiling Point	Volume 3, this submission	NPK LLC	OWN	
830.7300	Density, Bulk Density or Specific Gravity	Volume 3, this submission	NPK LLC	OWN	
Signature 			Name and Title Micah T. Reynolds, Regulatory Consultant to NPK LLC		Date August 9, 2012



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WASHINGTON, D.C. 20460

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**DATA MATRIX**

Date <b>August 9, 2012</b>	EPA Reg. No./File Symbol <b>89015-R</b>	Page <b>3 of 3</b>
Applicant's/Registrant's Name & Address: <b>NPK LLC 1600 Skypark Drive, Suite 215 Medford, Oregon 97504</b>	Product <b>Synergy</b>	

Ingredient **Pyrethrins (CAS Reg. No. 8003-34-7; PC code 69001) & Canola Oil (CAS Reg. No. 120962-03-0; PC Code 11332)**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>PRODUCT CHEMISTRY:</b>					
830.7370	Dissociation Constant	Volume 3, this submission	NPK LLC	OWN	
830.7520	Particle size, fiber length, diameter distribution	Volume 3, this submission	NPK LLC	OWN	
830.7550; 830.7560; 830.7570	Octanol-Water Partition Coefficient	Volume 3, this submission	NPK LLC	OWN	
830.7840 ; 830.7860	Water Solubility: Column Elution Method; Shake Flask Method	Volume 3, this submission	NPK LLC	OWN	
830.7950	Vapor Pressure	Volume 3, this submission	NPK LLC	OWN	
<b>TOXICOLOGY:</b>					
870.1100	Acute Oral Toxicity: Rat	44076904	W. Neudorff GmbH KG	OLD	DP Barcode D233197
870.1200	Acute Dermal Toxicity: Rat	44076905	W. Neudorff GmbH KG	OLD	DP Barcode D233197
870.1300	Acute Inhalation Toxicity: Rat	44157701	W. Neudorff GmbH KG	OLD	DP Barcode D233197
870.2400	Primary Eye Irritation: Rabbit	44076906	W. Neudorff GmbH KG	OLD	DP Barcode D233197
870.2500	Primary Dermal Irritation	44076907	W. Neudorff GmbH KG	OLD	DP Barcode D233197
870.2600	Dermal Sensitization	44076900	W. Neudorff GmbH KG	OLD	DP Barcode D233197

Signature 	Name and Title <b>Micah T. Reynolds, Regulatory Consultant to NPK LLC</b>	Date <b>August 9, 2012</b>
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			NPK LLC	OWN	
			NPK LLC	OWN	
			N/A – Product is formulated.		
			NPK LLC	OWN	
			NPK LLC	OWN	
			N/A – Product is formulated.		
			NPK LLC	OWN	
			NPK LLC	OWN	
			Available upon request		
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
Signature 			Name and Title <b>Micah T. Reynolds, Regulatory Consultant to NPK LLC</b>		Date <b>August 9, 2012</b>






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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
			Not Required for End-use Products.		
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
			NPK LLC	OWN	
Signature 			Name and Title <b>Micah T. Reynolds, Regulatory Consultant to NPK LLC</b>		Date <b>August 9, 2012</b>




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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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			NPK LLC	OWN	
			W. Neudorff GmbH KG	OLD	DP Barcode D233197
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Signature 			Name and Title <b>Micah T. Reynolds, Regulatory Consultant to NPK LLC</b>		Date <b>August 9, 2012</b>


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I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

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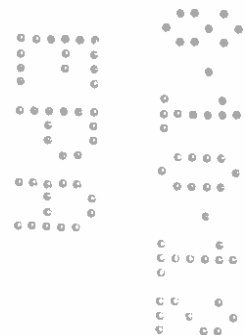
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\_\_\_\_\_  
Signature

August 9, 2012  
\_\_\_\_\_  
Date

Micah T. Reynolds  
\_\_\_\_\_  
Name (typed)

Regulatory Consultant to NPK LLC  
\_\_\_\_\_  
Title



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